

Hearing Date and Time: October 24, 2011
at 10:00 a.m.

JAECKLE FLEISCHMANN & MUGEL, LLP

12 Fountain Plaza, Suite 800

Buffalo, New York 14202

Tel: 716.856.0600

Fax: 716.856.0432

Beverley S. Braun, Esq. (admitted *pro hac vice*)

bbraun@jaeckle.com

Attorneys for Jamestown Container Corporation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Chapter 11
)	
DPH HOLDINGS CORP., <i>et al.</i> ,)	No. 05-44481 (RDD)
)	
Debtors.)	Jointly Administered
_____)	
)	
DELPHI AUTOMOTIVE SYSTEMS, LLC,)	
)	
Plaintiff,)	
)	Adv. Pro. No. 07-02322
-against-)	
)	
JAMESTOWN CONTAINER CORP.,)	
)	
Defendant.)	
_____)	

**JAMESTOWN CONTAINER CORP'S REPLY TO REORGANIZED DEBTORS'
OMNIBUS RESPONSE TO CERTAIN DEFENDANTS' SUBMISSIONS REGARDING
THE OCTOBER 2, 2009 SUPPLEMENTAL POST CONFIRMATION EXTENSION OF
AVOIDANCE ACTION SERVICE DEADLINE MOTION**

Defendant Jamestown Container Corporation, by and through counsel, hereby submits
this Reply to Reorganized Debtors' Omnibus Response to Certain Defendants' Submissions
Regarding the October 2, 2009 Supplemental Post Confirmation Extension of Avoidance Action
Service Deadline Motion

1. In the interest of judicial economy, Jamestown Container Corporation joins and adopts all relevant arguments and authorities, as if fully stated herein, set forth in all Replies of those parties who are similar situated, including but not limited to the Omnibus Reply of Certain Defendants to Reorganized Debtors' Omnibus Response to Certain Defendants' Submissions Regarding the October 2, 2009 Supplemental Post Confirmation Extension of Avoidance Action Service Deadline Motions (Docket No. 21624).

2. Jamestown Container Corp. is one the "No Notice" defendants identified in the Reorganized Debtors' Omnibus Response.

3. Moreover, in their response, the Debtors never affirmatively stated that Jamestown Container had been served with the Fourth Extension Order pursuant to this Court's directive.

Respectfully submitted,

Dated: Buffalo, New York
October 7, 2011

JAECKLE FLEISCHMANN & MUGEL, LLP

By: /s/ Beverley S. Braun

Beverley S. Braun, Esq. (admitted *pro hac vice*)

12 Fountain Plaza, Suite 800

Buffalo, New York 14202

Tel: 716-856-0600

Fax: 716-856-0432

bbraun@jaeckle.com

Counsel to Jamestown Container Corp.